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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

Case: 2:22-cr-20121
Judge: Berg, Terrence G.
MJ: Grey, Jonathan J.C.
Filed: 03-03-2022 At 04:44 PM
INDI USA V ADE JASMIN BROWN (LG)

VIO: 18 U.S.C. § 922(g)(1)

ADE JASMIN BROWN,

Defendant.

/

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
18 U.S.C. § 922(g)(1)
Felon in Possession of a Firearm

On or about January 6, 2022, in the Eastern District of Michigan, the defendant, ADE JASMIN BROWN, having previously been convicted of a felony, that is, a crime punishable by imprisonment for a term exceeding one year, and knowing that he had previously been convicted of a felony, did knowingly possess a firearm, that is, a Bryco, Jennings Nine, 9mm pistol, said firearm having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATIONS
18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)
Criminal Forfeiture

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), and Title 28 United States Code, Section 2461(c).

Upon conviction of the offense charged in Count One of the Indictment, the defendant shall forfeit to the United States any firearms or ammunition involved in or used in any knowing violation of section 922(g).

THIS IS A TRUE BILL

s/ Grand Jury Foreperson

GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/ Benjamin Coats

BENJAMIN COATS
Chief, General Crimes Unit
Assistant United States Attorney

s/ Diane Princ

DIANE PRINC
Assistant United States Attorney

Date: March 3, 2022

United States District Court Eastern District of Michigan	Criminal Case Cover
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

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Companion Case Information		Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :		Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		AUSA's Initials: <u>DNP</u>

Case Title: USA v. Ade Jasmin Brown

County where offense occurred : Wayne

Check One: **Felony** **Misdemeanor** **Petty**

- Indictment/ Information --- no prior complaint.
✓ Indictment/ Information --- based upon prior complaint [Case number: 22-mj-30070]
 Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- Corrects errors; no additional charges or defendants.
 Involves, for plea purposes, different charges or adds counts.
 Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

March 3, 2022

Date

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Attorney Bar #: NY4781159

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.